

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

CARLA J. SCHREIBER,) CASE NO. 8:05CV537
)
 Plaintiff,) PLAINTIFF'S EXHIBIT LIST
)
 vs.)
)
 STATE OF NEBRASKA, and THE)
 NEBRASKA STATE PATROL,)
)
 Defendants.)

Exhibit No.		DESCRIPTION	Off'd	Stip.	Obj.	Rec'd	Not Rec'd
PL.	DF.	<u>POLICIES:</u>					
1		NSP Policy number 04-03-01 "The Personnel Process" (Promotions), 3 pages					
2		NSP Policy number 20-07-01 "Personnel SOP 20-1" (Filling Vacant Positions), 8 pages					
3		NSP Policy No. 21-01-01, "Personnel SOP 20-1" (Classification Procedures)					
4		NSP Policy No. 25-01-01, "Personnel SOP 20-1" (Superintendent's Responsibilities)					
5		NSP Policy No. 25-03-01, "Personnel SOP 20-1" (Investigative Services Position)					

OBJECTIONS:

- R: Relevancy
- H: Hearsay
- A: Authenticity
- O: Other (specify)

*May be used

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6	NSP Policy 25-07-01, "Personnel SOP 20-1" (Troop Area Positions)					
7	NSP Policy No. 25-10-01, "Personnel SOP 20-1" (Executive Protection Division)					
8	NSP Policy No. 25-11-01 and 21-01-01, "Personnel SOP 20-1" (Internal Affairs Division)					
9	NSP Policy No. 25-13-01, "Personnel SOP 20-1" (Capitol Detail Division)					
10	NSP Policy No. 25-19-01, "Personnel SOP 20-1" (Human Resources Division)					
11	NSP Policy No. 25-20-01, "Personnel SOP 20-1" (Training Academy)					
12	NSP Policy No. 25-22-01, "Personnel SOP 20-1" (Carrier Enforcement Division)					
13	NSP Policy No. 25-33-01, "Personnel SOP 20-1" (Investigative Services Function)					
14	NSP Policy No. 25-34-01, "Personnel SOP 20-1" (Traffic Services Function)					
15	NSP Policy No. 34-01-01, "Personnel SOP 20-1" (Promotional Process)					
16	NSP Policy No. 35-02-01, "Personnel SOP 20-1" (Performance Appraisals)					
17	State of Nebraska Class Specification, "State Patrol Trooper", 3 pages					
18	State of Nebraska Class Specification, "State Patrol Sergeant", 3 pages					
19	State of Nebraska Class Specification, "State Patrol Investigative Sergeant", 2 pages					
20	State of Nebraska Class Specification, "State Patrol Lieutenant", 2 pages					

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21		CEO Sergeant Compliance Review Coordinator					
22		Nebraska State Patrol Post of 3/23/01 for Supervisor Position (CEO)					
23		Nebraska State Patrol Policies and Procedures Manual 2004-2005					
		CONTRACTUAL DOCUMENTS					
24		SLEBC/State Labor Agreement 2003-2005					
25		SLEBC/State Labor Agreement 2005-2007					
		AGENCY GOALS/OBJECTIVES/ CRITIQUES/LISTS					
26		2004 Affirmative Action Report for NSP (35 pages)					
27		2005 Affirmative Action Report for NSP					
28		2000-2005 Nebraska State Patrol Five Year Strategic Plan					
29		2002 Lieutenant's Promotional Competition process					
30		2004 Lieutenant's Promotional Competition process					
31		2006 Lieutenant's Promotional Competition process					
32		2002 Lieutenant's Eligibility List					
33		2004 Lieutenant's Eligibility List					
34		2006 Lieutenant's Eligibility List					
35		September 26, 2006 NSP Seniority List					
36		Nebraska State Patrol Organizational Chart					

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37	Defendants Answers to Interrogatories					
38	Request for Production (1 st Set), Responses 8,10					
39	Request for Production (3rd Set), 2002-2006 promotion recommendations (NSP204)					
40	State Document Retention Policy for NSP					
41	NSP Recruitment document post					
	EVALUATIONS:					
42	Schreiber evaluation 9/3/90-9/3/91					
43	Schreiber evaluation 9/3/91-9/3/92					
44	Schreiber evaluation 9/3/92-9/3/93					
45	Schreiber evaluation 12/4/94-3/3/95					
46	Schreiber evaluation 3/4/95-6/5/95					
47	Schreiber evaluation 6/6/95-9/3/95					
48	Schreiber evaluation 9/3/95-9/3/96					
49	Schreiber evaluation 12/1/96-9/30/97					
50	Schreiber evaluation 9/3/97-9/3/98					
51	Schreiber evaluation 9/3/98-9/2/99					
52	Schreiber evaluation 9/3/99-9/2/2000					
53	Schreiber evaluation 9/3/00-9/2/01					
54	Schreiber evaluation summary ending 9/3/02					
55	Schreiber evaluation 9/3/02-9/3/03					
56	Schreiber evaluation 9/3/03-9/3/04					
57	Schreiber evaluation 9/3/04-9/3/05					

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Exhibit No.	DESCRIPTION	Off'd	Stip.	Obj.	Rec'd	Not Rec'd
	<u>QUALIFICATIONS:</u>					
58	Backster School of Lie Detection Certificate (1997)					
59	Polygraph Association membership					
60	Schreiber Bachelor of Arts Certificate (Concordia w/ transcript - includes SE Comm. College)					
61	Schreiber Master's Degree Certificate (Doane), w/ transcript					
62	Schreiber Polygraph License (Nebraska)					
63	Nebraska State Patrol Training and Certificates					
64	Approval of SCAN Teaching and listings					
	<u>LT. TRAFFIC SERVICES POSITION:</u>					
65	Lieutenant Traffic Posting Document (4/16/04)					
66	Letter of interest in position (Schreiber)					
67	Letter of interest in position (Wilson)					
68	Letter of interest in position (Terry)					
69	Dan Wilson Resume submission					
70	Steven Terry Resume submission					
71	Carla Schreiber Resume submission					
72	Recommendation Form NSP204					
73	Scoring sheets with questions, Lt. Traffic Services					
74	July 22, 2004, letter of promotion (Dan Wilson)					
75	June 12, 2006, salary increase letter (Dan Wilson)					

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Exhibit No.	DESCRIPTION	Off'd	Stip.	Obj.	Rec'd	Not Rec'd
76	9100 Agency Contact Forms (Dan Wilson)					
77	9100 Agency Contact Forms (Steve Terry)					
	LT. INVESTIGATIVE SERVICES POSITION: (First)					
78	Lt. ISO Posting Document (6/28/04)					
79	Letter of interest in position (Schreiber)					
80	Letter of interest in position (Terry)					
81	Carla Schreiber Resume submission					
82	Steve Terry Resume submission					
83	Recommendation Form NSP204					
84	Scoring sheets with questions, Lt. Investigative Services					
85	Traffic activity sheets pulled for Terry and Schreiber					
86	Don Blausey critique transcript					
87	NEOC Discrimination charges filed 8/30/04					
	LT. INVESTIGATIVE SERVICES POSITION: (Second)					
88	Lt. ISO Posting Document (9/27/04)					
89	Letter of interest in position (Schreiber)					
90	Letter of interest in position (Svoboda)					
91	Letter of interest in position (Morehead)					
92	Galen Svoboda resume submission					
93	Carla Schreiber resume submission					
94	Randy Morehead resume submission					

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95	10/13/04 Scheduling Interview notice					
96	Scoring sheets with questions, Lt. Investigative Services					
97	Memorandum to Col. Nesbitt dated 10/22/04 with Troop B I.S. Lt. Recommendation					
98	October 27, 2004 promotional letter (Morehead)					
99	June 12, 2006 salary increase letter (Morehead)					
100	9100 Agency Contact Forms (Morehead)					
101	9100 Agency Contact Forms (Svoboda)					
102	9100 Agency Contact Forms (Schreiber)					
103	Randy Morehead investigations (2001-2004)					
104	Randy Morehead 8/2/04 accident observation document					
105	11/24/04 NEOC Complaint filing					
	<u>LT. EXECUTIVE PROTECTION POSITION:</u>					
106	Lt. Executive Protection Posting Document 6/13/05)					
107	Letter of interest in position (Schreiber)					
108	Letter of interest in position (Hattan)					
109	Carla Schreiber resume submission					
110	Paul Hattan resume submission					
111	Scoring sheets, Lt. Exec. Protection					
112	NSP Form 204 promotion recommendation					
113	9100 contacts for Paul Hattan					

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114 *		Dedick Letter response to NEOC with notes dated 1/24/06					
115		June 12, 2006, letter of salary increase					
		<u>LT. INTERNAL AFFAIRS POSITION:</u>					
116		Lt. Internal Affairs Posting Document (July 25, 2005)					
117		Letter of interest in position (Schreiber)					
118		Letter of interest in position (Kinghorn)					
119		Carla Schreiber Resume Submission					
120		Todd Kinghorn Resume Submission					
121		NSP Form 204 promotion recommendation					
122		Scoring sheets, Lt., Internal Affairs					
123		9100 contacts for Todd Kinghorn					
124		Letter of promotion August 18, 2005 to Todd Kinghorn					
125		Letter of salary increase, June 12, 2006					
126		Arbitration decision re: Jason Sears					
127		Patrol arbitration transcript re: Jason Sears v. NSP					
		<u>LT. TRAFFIC SERVICES POSITION:</u>					
128		Lt. Traffic Services posting, May 12, 2006					
129		Letter of interest in position (Schreiber)					
130		Carla Schreiber resume submitted					
131		Mike Jahnke letter of interest in position					
132		Mike Jahnke resume submitted					

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133	Robert Frank letter of interest in position					
134	Robert Frank resume submitted					
135	NSP 204 promotion recommendation					
136	Scoring sheets, Lt. Traffic					
137	9100 contacts, Mike Jahnke					
138	9100 contacts, Robert Frank					
	EXPERTS:					
139	2002-2006 Sgt. promotional documents					
140	Jose Soto, curriculum vitae					
141	Promotion table, Jose Soto (NSP Table)					
142	EEOC Calculation Form, Jose Soto					
143	NSP reported national ranking (1999)					
144	NSP reported national ranking (2001)					
145	David Rosenbaum, curriculum vitae					
146	Promotion tables, David Rosenbaum					
147	Demonstrative Exhibit (Rosenbaum) (RESERVED)					
148	Demonstrative Exhibit (Rosenbaum) (RESERVED)					
149	Promotional Lts. lists completed by Col. B. Tuma (See Depo. Exhibit 61)					
150 *	10/7/04 Letter Response to NEOC (Sue Dedick)					

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	PERSONNEL LISTS:					
151	60th Anniversary rosters for NSP camp listings 1937-1997					
152	NSP 32nd Recruitment Class					
153	NSP 33rd Recruitment Class					
154	NSP 34th Recruitment Class					
155	NSP 35th Recruitment Class					
156	NSP 36th Recruitment Class					
157	NSP 37th Recruitment Class					
158	NSP 38th Recruitment Class					
159	NSP 39th Recruitment Class					
160	NSP 40th Recruitment Class					
161	NSP 41st Recruitment Class					
162	NSP 42nd Recruitment Class					
163	NSP 43rd Recruitment Class					
164	NSP 44th Recruitment Class					
165	NSP 45th Recruitment Class					
166	NSP 46th Recruitment Class					
167	NSP 47th Recruitment Class					
168	NSP 48th Recruitment Class					
169	NSP 49th Recruitment Class					
170	NSP 50th Recruitment Class					

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	<u>ADMINISTRATIVE PROMOTIONS:</u>					
171	Troop A, Lt. Traffic Services projects for Konfrst/Doggett competition (Request for production responses - 4 th Set)					
172	Administrative Major competition 2005 (Request for production responses - 4 th Set)					
173 *	Administration Major competition 2006 (Request for production responses - 4 th Set)					
174	Captain, Administrative Services competition, 2005 (Request for production responses - 4 th Set)					
	<u>PERSONNEL TABLES:</u>					
175	Schreiber tables re: breakdown of Traffic Services division					
176	Schreiber tables re: breakdown ISO division					
177	Schreiber tables re: breakdown police service dog division					
178	Schreiber table: females/rank structure					
	<u>MISCELLANEOUS:</u>					
179	January 23, 2004 Commander Meeting Agenda					
180 *	January-December, 2004 calendars (C. Schreiber)					
181	Letter of March 2004 from Governor re: STAN Board Meeting					
182 *	Peters memo of 1/10/06					

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183 *		Kurt VonMinden grievance investigation materials					
184 *		Kurt VonMinden e-mail of 12/13/04					
185 *		Photo - Schreiber					
186 *		Photo - Schreiber					
187 *		Photo - T. Blausey					
188		11/18/05 EEOC Complaint					
189		Deputy State Sheriff Certificate					
190 *		2004 CALEA Report					
191		Investigative Services Sgt. Letter w/ NSP204 form					
192		City of Omaha workforce statistics (2004-2005)					
193		City of Lincoln workforce statistics (2004-2005)					
194 *		10/7/04 Letter response to NEOC (Dedick)					
195 *		12/6/04 Letter response to NEOC (Dedick)					
196 *		Judy Bailey NEOC Complaint of 2/7/01					
197 *		Rice transcript critique and tape					
198 *		Peters transcript critique and tape					
199		Schreiber program request document					
200		Schreiber previous ISO positions applied for					
201 *		Bradley Rice NEOC Interview on 5/19/05					

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202	*	Dan Wilson NEOC Interview on 5/19/05					
		<u>BUSINESS PLANS:</u>					
203		Business Plan for Promotion - Schreiber (Internal Affairs)					
204		Business Plan for Promotion - Schreiber (Executive Protection)					
205		Business Plan for Promotion - Schreiber (Traffic Services - HQ)					
206		Business Plan for Promotion - Schreiber (Investigative Services)					
207		Business Plan for Promotion - Schreiber (Troop B Traffic Services)					

CARLA SCHREIBER, Plaintiff,

BY s/ VINCENT VALENTINO

Vincent Valentino, #14288
ANGLE, MURPHY, VALENTINO
& CAMPBELL, P.C.
617 Grant Avenue
P.O. Box 584
York, Nebraska 68467
(402) 362-7725

and

Terri Weeks, #18349
Bowman and Krieger
1045 Lincoln Mall, Ste. 100
Lincoln, NE 68508
(402) 476-8005

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of December, 2006 the above and foregoing was filed electronically with the Clerk of the Court using the CM/ECF system which sent notification of such filing to Frederick J. Coffman, Kevin K. Stephenson, Vincent Valentino and Terri M. Weeks.

s/ VINCENT VALENTINO
Vincent Valentino, # 14288

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